

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE**

FUSION ELITE ALL STARS, et al.,

Plaintiffs,

v.

VARSITY BRANDS, LLC, et al.,

Defendants.

Case No. 2:20-cv-02600-SHL-cgc

**DECLARATION OF VICTORIA SIMS IN SUPPORT OF
PLAINTIFFS' MOTION TO COMPEL DISCOVERY
RESPONSES FROM VARSITY DEFENDANTS**

I, Victoria Sims, declare the following under penalty of perjury:

1. I am an attorney with the law firm of Cuneo Gilbert & LaDuca LLP, counsel for Plaintiffs, and Interim Co-Lead Counsel for Direct Purchasers in the above-captioned matter. I make this affidavit on personal knowledge and review of my files, except as otherwise indicated. I submit this declaration in support of Plaintiffs' Motion to Compel Discovery Responses From Varsity Brands, LLC, Varsity Spirit, LLC, and Varsity Spirit Fashion & Supplies, LLC (collectively, "Varsity").

2. Attached as Exhibit 1 is an excerpt from Defendant U.S. All Star Federation's responses to Plaintiffs' First Set of Interrogatories, served by USASF on December 28, 2020.

3. Attached as Exhibit 2 is a true and accurate copy of correspondence sent by Steven J. Kaiser, counsel for Varsity, to the undersigned on March 19, 2021.

4. Attached as Exhibit 3 is a true and correct copy of the LinkedIn profile for James Hill, available at <https://www.linkedin.com/in/jimhilljr/> (last accessed May 4, 2021).

5. I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Executed this 5th day of May, 2021 in Washington, DC.

s/ Victoria Sims

Victoria Sims